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February 17, 2021

Via ECF Only

Honorable Paul Crotty
United States District Court Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY. 10007

2/18/2021

The motion schedule is
extended to February 26,
2021. Time will be
excluded. SO ORDERED.



Re: U.S. v. Zhen, et. Al.
Case 20-cr-56(PAC)

Your Honor,

My office represents Mr. Guzman, a defendant in the above referenced matter. The Government conveyed a new offer to my client and the other defendants. These new offers have been made available until February 25, 2021. I write on behalf of my client, as well as counsel for the three other defendants, to **respectfully request an extension of time to extend the schedule to file the defense motions until February 26, 2021.** All defense counsel and the counsel for the Government have conferred and agree to the proposed extension.

As a caveat, Mr. Russo (counsel to Mr. Hernandez) was discharged from the hospital yesterday and is still suffering the effects and limitations derived from his battle with COVID-19. His ability to participate during this timeframe remains questionable.

Counsel further agrees and requests that time, pursuant to the Speedy Trial Act, be excluded until the adjourned conference date set by the Court. The Court's consideration of this request is respectfully appreciated. Thank you.

Yours truly,

Michael D. Horn.

Michael D. Horn, Esq.

Counsel for the Guzman-Martinez

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cc: AUSA Aline Flodr (via ECF)
All Defense Counsel (via ECF)